

**U.S. Department of Justice**



*United States Attorney  
Southern District of New York*

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*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

December 13, 2021

**BY ECF**

The Honorable Alison J. Nathan  
United States District Court  
Southern District of New York  
United States Courthouse  
40 Foley Square  
New York, New York 10007

**Re:     *United States v. Ghislaine Maxwell, S2 20 Cr. 330 (AJN)***

Dear Judge Nathan:

The Government respectfully submits this letter regarding the question whether the pending privilege issue could be resolved by a stipulation regarding the testimony of Robert Glassman. After considering the issue and conferring with defense counsel, the Government remains of the view that the statement in the email is not admissible and requires additional context for it to be understandable by the jury. (*See* Gov't Letter at 7-8, Dkt. No. 528; 12/6/21 Letter from Robert Glassman at 3-4). Accordingly, the Government would not enter into such a stipulation.

Respectfully submitted,

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United States Attorney

By: s/

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Cc: Defense Counsel (by ECF)